



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY  
STATE OF OKLAHOMA

KATHERINE LEIGH REICHARD and  
WILLIAM REICHARD,

Plaintiffs,

v.

TARGET CORPORATION,

Defendant.

**CJ-2020-02506**

DOUG DRUMMOND

Case No.

Jury Trial Demanded

Attorney's Lien Claimed

DISTRICT COURT  
**FILE**

AUG 14 2020

DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

**PETITION**

**COMES NOW** the Plaintiffs, by and through their attorney of record James E. Frasier of Frasier, Frasier & Hickman, LLP, and for this their claims and cause of action against the Defendant allege and state as follows:

**COUNT ONE**

**I**

That the facts which give rise to this cause of action occurred in Tulsa County, State of Oklahoma.

That this Court has jurisdiction of the parties and the subject matter of this action.

That at all times material herein Target Corporation was acting by and through its agents, servants and employees who were all within the scope and appointment of their agency and authority.

**II**

That on or about the 27<sup>th</sup> day of August, 2019, the Plaintiff Katherine Leigh Reichard was a business invitee to Defendant's store in Tulsa, Oklahoma, in the Tulsa Hills area near 71<sup>st</sup> Street and Highway 75.

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CLERK OF DISTRICT COURT

### III

At that time and at that place the Plaintiff Katherine Leigh Reichard suffered a severe fall which has resulted in permanent injuries that have prevented her from transacting her business, and forced her to expend large sums of money in an effort to effect a cure to her injuries, which injuries are serious and painful in their nature.

The fall suffered by the Plaintiff was caused by a defect or a condition known to the Defendant on Defendant's premises.

Plaintiff's injuries were directly caused by the Defendant's failure to exercise due care to warn this Plaintiff of the defect or condition, which defect was not obvious or plainly visible, and of which the Plaintiff was wholly unaware and which the Plaintiff could not participate in the exercise of ordinary care, have discovered.

### IV

That at the time of the negligence of the Defendant and the resulting injuries to the Plaintiff, Katherine Leigh Reichard, was 27 years of age with a normal life expectancy of 55 years according to the United States Life Tables.

### COUNT TWO

**COMES NOW**, the Plaintiff, William Reichard, and adopts all allegations heretofore made in Count One as if fully set forth herein.

### V

That at all times material herein the Plaintiff William Reichard was the loving and lawfully married husband of the Plaintiff Katherine Leigh Reichard. As a result of the fall described herein this Plaintiff has suffered a loss of companionship, society, and consortium.

**WHEREFORE**, premises considered, Plaintiffs, and each of them, do pray for judgment against the Defendant in a sum in excess of \$10,000, together with interest thereon, all costs of this action, and for such other relief to which they may be entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

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